

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE	*	CASE NO. 12-81330-CRM
	*	
CAROLE MARIE KEENE,	*	
	*	CHAPTER 13
	*	
	*	
	*	
DEBTOR.	*	

MOTION TO EXCUSE DEFAULT ON PAYMENTS TO CHAPTER 13 TRUSTEE

COMES NOW **Carole Marie Keene**, by and through the undersigned counsel, and files this "Motion to Excuse Default on Payments to Chapter 13 Trustee", showing this Honorable Court the following:

1.

Debtor filed a Petition constituting an Order For Relief under Title 11 U.S.C. Chapter 13 on December 21, 2012.

2.

On March 5, 2013, Debtor Chapter 13 Plan was confirmed. The plan calls for payments to the Trustee at \$1,500.00 monthly.

3.

Debtor needs to replace clothes dryer.

4.

Debtor respectfully requests the default in plan payments for the month of June 2015 to be excused. Plan payments shall resume on July 1, 2015 at which time Debtor shall modify her plan and schedules to cure terms problem, if any.

WHEREFORE, Debtor prays:

- (a) That this "Motion to Excuse Default on Payments to Chapter 13 Trustee" be filed, read and considered;

- (b) That the Plan payments shall resume on July 1, 2015 at which time Debtor shall modify her plan and schedules to cure terms problem, if any. Plan payments be excused; and
- (c) That this Honorable Court grant such other and further relief as it may deem just and proper.

Respectfully submitted,
CLARK & WASHINGTON, PC

By: /s/
Christopher J. Kiefer
Attorney for the Debtor
GA Bar No. 417247

CLARK & WASHINGTON, PC
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Phone (404) 522-2222
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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE
CAROLE MARIE KEENE,

DEBTOR.

* CASE NO. 12-81330-CRM
*
*
* CHAPTER 13
*
*
*

**NOTICE OF HEARING ON MOTION TO EXCUSE DEFAULT ON PAYMENTS TO
CHAPTER 13 TRUSTEE**

PLEASE TAKE NOTICE that the Debtor in the above-referenced matter filed a “**Motion**” seeking to have default on Trustee payments excused.

PLEASE TAKE FURTHER NOTICE that the Court will hold a hearing on the matter in Courtroom 1203 (12th Floor) of the US Courthouse, 75 Spring Street, SW, Atlanta, GA 30303, at 10:00 AM, on July 21, 2015.

Your rights may be affected by the court’s ruling on these pleadings. You should read these pleadings carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.) If you do not want the court to grant the relief sought in these pleadings or if you want the court to consider your views, then you and/or your attorney must attend the hearing. You may also file a written response to the pleading with the Clerk at the address stated below, but you are not required to do so. If you file a written response, you must attach a certificate stating when, how and on whom (including addresses) you served the response. Mail or deliver your response so that it is received by the Clerk at least two business days before the hearing. The address of the Clerk's Office is Clerk, U. S. Bankruptcy Court, Suite 1340, 75 Spring Street, Atlanta Georgia 30303. You must also mail a copy of your response to the undersigned at the address stated below.

Respectfully submitted,
CLARK & WASHINGTON, PC

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Building 3, Suite A
Atlanta, GA 30341
Phone (404) 522-2222
Fax (770)220-0685

_____/s/_____
Christopher J. Kiefer
GA Bar No. 417247
Attorney for the Debtor

CERTIFICATE OF SERVICE

I certify that I served the Debtor with a true and correct copy of the within the and foregoing “Notice of Hearing on Motion to Excuse Default on Payments to Chapter 13 Trustee” and “Motion to Excuse Default on Payments to Chapter 13 Trustee” by placing the same in the United States Mail with adequate postage affixed to ensure delivery and addressed as follows:

Carole Marie Keene
3534 Mackenzie Drive
Powder Springs, GA 30127

I further certify that, by agreement of the parties, Nancy Whaley - Chapter 13 Trustee, was served via the ECF electronic mail/noticing system.

And, in the same manner I served the parties listed in the attached matrix with the “Notice of Hearing on Motion to Excuse Default on Payments to Chapter 13 Trustee” at the addresses indicated therein,

Dated 6/10/15

/s/

Christopher J. Kiefer
GA Bar No. 417247
Attorney for the Debtor

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PRA Receivables Management, LLC
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NORFOLK, VA 23541-1067

TD Bank USA, N.A.
c/o Weinstein & Riley, P.S.
2001 Western Ave., Ste. 400
Seattle, WA 98121-3132

eCAST Settlement Corporation
c/o Bass & Associates, P.C.
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Tucson, AZ 85712-1083

American Express
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Malvern, PA 19355-0701

American Express
P.O. Box 650448
Dallas, TX 75265-0448

American Express Centurion Bank
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Malvern, PA 19355-0701

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Miami FL 33131-1605

Care Credit
GE Capital Retail Bank
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Orlando, FL 32896-0061

Chase Manhattan Bank
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Wilmington, DE 19886-5153

Chevron CTS/GECRB
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Atlanta, GA 30353-0950

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PO BOX 790034
ST LOUIS MO 63179-0034

Department Stores National Bank/Macys
Bankruptcy Processing
Po Box 8053
Mason, OH 45040-8053

Department Stores National Bank/Visa
Bankruptcy Processing
Po Box 8053
Mason, OH 45040-8053

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Carol Stream, IL 60197-5238

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Orlando, FL 32896-0090

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Milwaukee, WI 53201-2983

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P.O. Box 530914
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P.O. Box 183083
Columbus, OH 43218-3083

Macy's
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Nordstrom
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Rockland Employees Federal Credit Union
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